

KASOWITZ BENSON TORRES LLP

GAVIN D. SCHRYVER
DIRECT DIAL: (212) 506-1891
DIRECT FAX: (212) 835-5291
GSCHRYVER@KASOWITZ.COM

1633 BROADWAY
NEW YORK, NEW YORK 10019
(212) 506-1700
FAX: (212) 506-1800

ATLANTA
HOUSTON
LOS ANGELES
MIAMI
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SILICON VALLEY
WASHINGTON DC

May 4, 2022

VIA ECF

The Honorable John G. Koeltl
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007-1312

APPLICATION GRANTED
SO ORDERED

John G. Koeltl

John G. Koeltl, U.S.D.J.

5/6/22

Re: Roche Cyrulnik Freedman LLP v. Cyrulnik, Case No. 1:21-cv-01746 (JGK)

Dear Judge Koeltl:

We represent Jason Cyrulnik in the above-referenced action. Pursuant to Your Honor's Individual Rules of Practice, we write respectfully to request a 21-day extension of time to respond to the motions to dismiss filed by Counterclaim-Defendants Kyle Roche and Devin Freedman (ECF Nos. 102-04) ("Roche MTD") and Counterclaim-Defendants Nathan Holcomb, Edward Normand, and Amos Friedland (ECF Nos. 107-08) ("Holcomb MTD") from May 10, 2022 for the Roche MTD and May 11, 2022 for the Holcomb MTD to June 1, 2022 (for both). This is Cyrulnik's first request for an extension on these motions.

Cyrulnik initially requested a 30-day extension from Counterclaim-Defendants, through June 9, 2022. Counterclaim-Defendants refused to consent to any extension longer than two weeks, but did not provide a reason for their refusal. By way of compromise, Cyrulnik proposed a three-week extension, until June 1, 2022. Counterclaim-Defendants once again refused, this time stating that they cannot agree to more than two weeks "given the Court's scheduling order and the case deadlines." Cyrulnik respectfully submits that a three-week extension is warranted in light of the two motions to which he is responding (while at the same time working to comply with the compressed discovery schedule entered into at Counterclaim-Defendants' request), and that Cyrulnik himself will be at trial in the middle of the month, and respectfully requests that the Court grant an extension of time to June 1, 2022.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Gavin D. Schryver
Gavin D. Schryver

cc: Counsel of Record (via ECF)